

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 25-mj-8025-BER

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHAROAD ROLLE,

Defendant.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Miami Office of the United States Attorney's Office prior to July 20, 2008?

Yes      ☒ No

2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office (West Palm Beach Office) only prior to December 18, 2011?

Yes      ☒ No

3. Did this matter originate from a matter pending in the Fort Pierce Office of the United States Attorney's Office prior to August 8, 2014?

Yes      ☒ No

Respectfully submitted,

MICHAEL S. DAVIS  
ACTING UNITED STATES ATTORNEY

BY:



JOHN C. McMILLAN  
ASSISTANT UNITED STATES ATTORNEY  
Admin. No. A5500228  
500 S. Australian Ave., Suite 400  
West Palm Beach, FL 33401  
Office: (561) 820-8711  
John.mcmillan@usdoj.gov

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

SHAROAD ROLLE,

*Defendant(s)*

Case No. 25-mj-8025-BER

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 16, 2025 in the county of Palm Beach in the  
Southern District of Florida, and elsewhere, the defendant(s) violated:

*Code Section*

8 U.S.C. §§ 1324(a)(1)(A)(iv), 1324  
(a)(1)(A)(v)(II) & 1324(a)(1)(B)(ii);

*Offense Description*

Encouraging or inducing an alien to come to or enter the United States,  
knowing or in reckless disregard that such was in violation of the law.

This criminal complaint is based on these facts:

Please see attached Affidavit

☒ Continued on the attached sheet.

JUSTIN C  
WASHBURN

Digitally signed by JUSTIN  
C WASHBURN  
Date: 2025.01.18 08:51:55  
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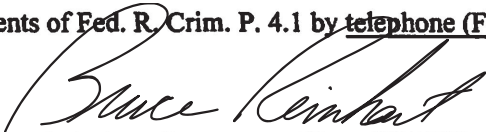
*Complainant's signature*

Justin Washburn, Special Agent, HSI

*Printed name and title*

Subscribed and sworn to before me in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone (Facetime).

Date: January 18, 2025



*Judge's signature*

City and state: West Palm Beach, Florida

Bruce Reinhart, United States Magistrate Judge  
*Printed name and title*

**Affidavit in Support of Criminal Complaint**

I, Justin Washburn, first being duly sworn, depose and state as follows:

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been so employed since April 2024. As a Special Agent with HSI, I have conducted investigations into immigration violations under Title 8 of the United States Code. Before working for HSI, I was a Customs and Border Protections Officer in the Derby Line, Vermont Area of Responsibility (AOR). Additionally, I was a State Certified Police Officer for the State of New Hampshire with a tenure of approximately 8 years enforcing criminal and motor vehicle law.

2. This Affidavit is based upon my personal knowledge, as well as on information provided to me by other law enforcement officers and agencies. Because this Affidavit is submitted for the limited purpose of establishing probable cause, it does not include everything I know about this investigation. Rather, I have included only those facts necessary to establish probable cause to believe that on or about January 16, 2025, Sharoad ROLLE knowingly encouraged or induced one or more aliens to come to, enter, or reside in the United States, knowingly or in reckless disregard of the fact that such coming to, entry, or residence is or will be in violation of law, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv), 1324(a)(1)(A)(v)(ii), 1324(a)(1)(B)(ii).

**Probable Cause**

3. On or about January 16, 2025, at approximately 10:00 p.m., United States Customs and Border Protection Air and Marine Operations (AMO) West Palm Beach (WPB) was notified by United States Coast Guard (USCG) Cutter Seahorse of a suspicious inbound vessel operating

with no visible navigational lights and multiple people on board. AMO WPB utilized the coordinates of the last known position of the inbound vessel provided by PBSO Aviation unit, discovering the vessel one nautical mile due east of Palm Beach Island within the coastal waters of the United States, and Palm Beach County and the Southern District of Florida. AMO WPB, USCG, and PBSO Marine Officers arrived on scene and observed multiple individuals sitting on board and one occupant standing at the bow of the vessel. The vessel having been detected entering the United States customs and immigration zone, a CBP officer asked a male subject that was standing at the bow of the vessel if he was the captain/driver of the vessel, and where they were coming from. The male at the front of the vessel's bow, later identified as Sharoad ROLLE, a citizen and national of the Bahamas, responded that he was "the captain," and stated they were coming from Freeport, Bahamas and that he was just trying to get to land.

4. After determining that none of the other occupants of the vessel spoke English or were in possession of any documents which would lawfully permit their entry into the United States, ROLLE and all migrants were transferred to the USCG Safe boat and were brought to the Coast Guard Cutter Seahorse for biometrics and processing. In addition to defendant ROLLE, a total of 5 adult Haitian females, 7 adult Haitian males, and 2 adult Brazilian males for a 14, were discovered on board the vessel, none of whom had any documents permitting their lawful entry into the United States.

5. On January 17, 2025, ROLLE was taken from the USCG Cutter and turned over to U.S. Border Patrol for immigration processing. Thereafter, your affiant and HSI Special Agent Joshua Woodbury, conducted an audio and video recorded interview of ROLLE. At the initiation of the interview, SA Woodbury advised defendant ROLLE of his *Miranda* warnings using the standard HSI advice of rights form, after which defendant ROLLE advised he understood his



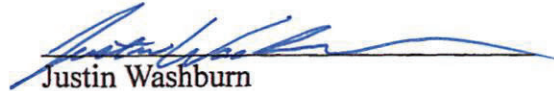
rights, advised he would voluntarily speak to us, and signed a written HSI *Miranda* warnings waiver form. Thereafter, ROLLE explained he was at a bar in 8 Mile Rock, Bahamas, when a male entered and purchased food items. ROLLE claimed he approached the man, who told him s getting snacks for a trip to the United States. ROLLE requested the male to take him to the United States, as he was looking to find more consistent employment in the United States. ROLLE told agents that he typically worked as a tile mason, fisherman, and diver. ROLLE asserted that while aboard the boat (in U.S. Territorial Waters) he operated the vessel for approximately 25 minutes. He observed helicopter lights in the distance and slowed the engine to an idle, ultimately stopping the vessel. Once met by CBP law enforcement ROLLE on the vessel admitted to being the boat captain, as he was behind the wheel. ROLLE advised that he only operated the vessel for approximately 25 minutes. ROLLE admitted knowing there were Haitian nationals aboard the vessel when he departed Bahamas en route to the United States, and therefore, your affiant submits ROLLE was aware of such while piloting the boat in Palm Beach County in the Southern District of Florida.

### **Conclusion**


On the basis of the foregoing facts, your affiant respectfully submits that probable cause exists to charge that on or about January 16, 2025, defendant Sharoad ROLLE knowingly encouraged or induced one or more aliens to come to, enter, or reside in the United States, knowingly or in reckless disregard of the fact that such coming to, entry, or residence is or will be in violation of

law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv), 1324(a)(1)(A)(v)(ii), and 1324(a)(1)(B)(ii).

FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
Justin Washburn  
Special Agent  
Homeland Security Investigations

ATTESTED TO ME TELEPHONICALLY  
(VIA FACETIME) BY THE APPLICANT  
IN ACCORDANCE WITH THE REQUIREMENTS  
OF FED. R. CRIM. P. 4.1 THIS 18th DAY  
DAY OF JANUARY, 2025.

  
BRUCE REINHART  
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**PENALTY SHEET**

**Defendant's Name:** Sharoad ROLLE

**Case No:** \_\_\_\_\_

**Count # 1**

**Alien Smuggling**

**Title 8, United States Code, Sections 1324(a)(1)(A)(iv), 1324(a)(1)(A)(v)(ii) and  
1324(a)(1)(B)(ii)**

**\* Max. Term of Imprisonment: 5 years**

**\* Mandatory Min. Term of Imprisonment (if applicable): not applicable**

**\* Max. Supervised Release: 3 years**

**\* Max. Fine: \$250,000.00**

**\* Special Assessment: \$100.00**

**\* Immigration Consequences of Removal (Deportation) from United States if Convicted**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**


**CASE NUMBER:** \_\_\_\_\_

**BOND RECOMMENDATION**

**DEFENDANT:** SHAROAD ROLLE

Pre-Trial Detention

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By:   
AUSA: John C. McMillan

Last Known Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

What Facility: \_\_\_\_\_

\_\_\_\_\_

Agent(s): HSI SPECIAL AGENT JOSHUA WOODBURY  
(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)